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6 Attorneys for Defendants
CITY OF SANTA ROSA; EDWIN FLINT, in his capacity
as Chief of Police for the CITY OF SANTA ROSA;
7 RICH CELLI, an individual and Officer of the
SANTA ROSA POLICE DEPARTMENT; TRAVIS MENKE,
8 an individual and Officer of the SANTA ROSA POLICE DEPARTMENT;
and PATRICIA MANN, an individual and Officer of the
9 SANTA ROSA POLICE DEPARTMENT

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

PATRICIA DESANTIS, et al.,

Case No. C 07-3386 JSW (consolidated with
C 07-4474)

Plaintiffs,

OBJECTION TO EVIDENCE IN SUPPORT OF PLAINTIFF'S MOTION FOR SUMMARY ADJUDICATION

CITY OF SANTA ROSA, et al.,

Date: October 17, 2008
Time: 9:00 a.m.
Ctrm: 2

Defendants

Trial Date: January 20, 2009

TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:

22 Defendants object to the evidence submitted in support of plaintiffs' motion for summary
23 adjudication regarding a prior shooting incident involving Sgt. Rich Celli contained at page 6,
24 line 23-page7, line 9 of their moving papers and specifically referencing the following deposition
25 testimony of Sgt. Rich Celli, attached as Exhibit B to the Declaration of John H. Scott:

1. Page 18, line 23
 2. Page 152, line 2-3
 3. Page 164, lines 12-13

4. Page 167, line 12-13
5. Page 167, lines 7-13
6. Page 168, lines 1-3
7. Page 168, line 20-*pg* 169, line 8
8. Page 174, lines 13-17
9. Page 175, lines 6-8
10. Page 176, line 4-7

8 Defendant objects that said evidence is not relevant and therefore inadmissible under
9 Federal Rule of Evidence 402 and is inadmissible under Federal Rule 403 and 404 and requests
10 that the court strike said evidence and not consider said evidence in ruling on Plaintiffs' Motion
11 for Summary Adjudication.

13 || Dated: September 5, 2008

/S/
Caroline L. Fowler
City Attorney
Attorney for Defendants
City of Santa Rosa, Santa Rosa Police Chief Ed Flint,
Santa Rosa Police Officers Rich Celli, Travis Menke,
and Patricia Mann